



P.O. BOX 2621

HARRISBURG, PA 17105

(MAY) 30, 2012

ORIGINAL

Mr. Kenneth I. Rose, III, Financial Analyst (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**RE: Submission of Information by PPC Corp.
Metro Container Site, Trainer, Pennsylvania**

Dear Mr. Rose:

This letter is in response to the letter from Ms. Joanne Marinelli, Chief, Cost Recovery Branch, Hazardous Site Cleanup Division, U.S. EPA, dated April 11, 2012, addressed to Petroleum Products Corporation and received on April 16, 2012.

As a preliminary matter, EPA's letter was addressed to Petroleum Products Corporation. To the best of our knowledge, Petroleum Products Corp. has never had any dealings of any kind with Metro Container or the Metro Container Site.

The entity that did business with Metro Container for a limited period of time from 1985 to 1987 was PPC Corp. ("PPC Corp."). PPC Corp. is the company that responded to the EPA's previous information request on July 15, 1988. PPC Corp. was an industrial and commercial lubricants distributor. It did not sell any fuels, only lubricants (e.g. oil, transmission fluid, cutting fluid, etc.). PPC Corp. exists today as a holding company and no longer markets or sells lubricants. There never has been any corporate relationship between Petroleum Products Corp. and PPC Corp. other than they had some of the same shareholders. The majority shareholder of Petroleum Products Corp. and PPC Corp. during 1985 to 1987, died in 1994. The current majority shareholder of Petroleum Products Corp. and PPC Corp. was neither involved with PPC Corp. nor a shareholder until the mid-1990s.

Although Petroleum Products Corp. was improperly identified as the recipient in EPA's letter, this response will assume that you meant to address your questions to PPC Corp. PPC Corp. has made its best efforts to respond, using the question and answer format, to the questions provided in Enclosure E in Ms. Marinelli's April 11, 2012 letter. The information provided is to the best of our current knowledge.

GENERAL RESPONSE:

To the best of our knowledge, Petroleum Products Corp. has never had any dealings with Metro Container. In 1985 to 1987, PPC Corp. ("PPC Corp.") had very limited involvement with Metro Container (see below). It has been 25 years since PPC Corp. had any business dealings with Metro Container. We have very few employees currently with the company who were with PPC Corp. in 1987. Raymond B. Harris, III, who was President of PPC Corp. in 1988 and

responded on behalf of PPC Corp. to EPA in 1988, is still with the company and employed as a Technical Services Engineer. As President, Mr. Harris had no dealings himself with Metro Container at that time and has no records relating to Metro Container. Furthermore, PPC Corp. has no relevant records from the period 1980 to 1988.

Records retention:

Generally, our records retention policy is to maintain most records for seven years. PPC Corp. attempts to adhere to this policy, but some documents may not be destroyed immediately at the end of the applicable retention period. Some financial records (e.g. audit reports, deeds, etc.) are retained for a longer period of time. For certain environmental records (e.g. above-ground storage tanks), we maintain records for a longer period of time (see enclosures).

All company records are subject to the same retention and disposal policy. The procedure is that PPC Corp. employees who have files determine on their own to send documents to the storage area when their file cabinets become too full. Since at least 1996 (and probably earlier, but we cannot verify the date), until 2010, approximately once a year Dennis Shaw, CFO, would mark older boxes for destruction. When PPC Corp. destroys documents, some are shredded and some are thrown into a dumpster for disposal. Mr. Shaw died in October 2010. Since 2010, Mike DeStefano, the current CFO has continued this practice.

In 2001 we moved our main records storage area from PPC Corp.'s South Eisenhower Boulevard facility in Middletown, Pennsylvania, to another storage area at a facility in Richland, Pennsylvania. Most, but not all, PPC Corp. records were moved at that time unless they were purged (see below). Some records remained at the South Eisenhower Boulevard facility. A small amount of company records were moved to another storage area at PPC Corp.'s facility in Mechanicsburg, Pennsylvania. In 2004, we moved our Richland facility along with the records storage area to another facility in Jonestown, Pennsylvania.

Some documents that were older than seven years that were not subject to a longer storage requirement were destroyed at the time of each move. In September 2011, as a result of Tropical Storm Lee, we had water in the storage area of the South Eisenhower Boulevard facility. As a result of that flooding, we destroyed all records that were older than seven years. Newer records were maintained, even if they were wet. PPC Corp. employees have searched the storage areas at South Eisenhower Boulevard, Jonestown and Mechanicsburg (we no longer have any facilities in Richland) and have not been able to identify any documents that relate to the Metro Container facility.

Previous response:

In good faith we are attempting to provide the best answers that we are capable of providing. On May 3, 2012, as a result of a document request to EPA, Mr. Kenneth Rose forwarded to our counsel a copy of a letter that was submitted by PPC Corp. to EPA on July 15, 1988 in response to an earlier request for information from EPA. It should be noted that we

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could not locate a copy of this document in our files, however we do not question its authenticity. That letter stated:

[PPC Corp. Letterhead]
July 15, 1988

PPC Corp. did business with Metro Container from November 21, 1985 thru November 15, 1987 buying 780 drums and returning 266 drums during that period. All drums sent to Metro Container from PPC Corp. were picked up from PPC Corp. customers and would have PPC Corp.'s 800 phone number, PPC Corp.'s name stamped on the drums and Exxon, Mobil, Sun, Shell or Chevron Corporations's [sic] label and logo on the drum.

PPC Corp. has a stated policy of not picking up grease or solvent drums, drivers also will not pick up drums containing more than one quart of liquid, unless we are provided with a Material Safety Data Sheet and written assurance that the drum contains product listed on MSDS.

PPC Corp. Insurance Policies issued to cover spill clean up are for named locations only.

Please advise as to what listed hazardous substances you refer to in your letter.

Sincerely,
PPC Corp.
/S/
Raymond B. Harris III President

PPC Corp. has been unable to identify any relevant documents, requests or responses other than the one-page letter forwarded to us by EPA. We are continuing to search our records.

We have no reason to dispute or modify Mr. Harris's 1988 letter and it represents the best contemporaneous (i.e. 1988) understanding of PPC Corp.'s involvement with Metro at the time. We incorporate that letter by reference and have nothing further to add to the statement.

1. EPA has information which indicates that you sent drums to the Metro Container Site between 1980-1988 from one or more of your facilities. For each such facility, identify:

a) the address of the facility; and

If drums were sent to Metro Container, they would have been shipped through PPC Corp.'s facility at 900 South Eisenhower Boulevard, Middletown, Pa.

b) the products/materials produced at such facility between 1980-1988.

PPC Corp. both (1) bought mineral and synthetic hydrocarbon lubricants (used in, e.g., engines, gear boxes, transmissions, turbines, etc.) in bulk quantities from a refiner (e.g. Sun, Mobil, Exxon), metered the lubricants into 55 gallon drums and shipped the lubricant in the drum to the customer; and (2) bought lubricants prepackaged in a 55-gallon drum from a refiner and shipped the lubricant in the drum to the customer. Lubricants that were prepackaged in 55 gallon drums were not opened by PPC Corp.

2. Identify the processes used between 1980-1988 to produce the products/materials identified in response to Question #1.

PPC Corp. did not produce any products or materials. In addition, see response to Question 1(b).

3. Identify the raw materials used in the processes identified in response to Question #2.

PPC Corp. did not produce any products or materials. In addition, see response to Question 1(b).

4. Identify all wastes and by-products generated between 1980-1988 from the processes identified in response to Question #2.

None. There were no spills. To the extent that there was any drippage of lubricants (estimated at less than 20 gallons a year), that oil would have been burned in PPC Corp.'s waste oil burner. PPC Corp. did not produce any products or materials. In addition, see response to Question 1(b).

5. For each raw material and waste/by-product identified in response to Questions #3 and #4:

a) Identify the chemical composition.

See response to Questions 1(b), 3 and 4. PPC Corp. only dealt with petroleum products. It has been between 25 – 32 years since 1980 – 1988 and PPC Corp. no longer has any records of the chemical composition of any products from 1980-1988. PPC Corp. has no independent way of knowing the chemical composition of any products and relied on the chemical composition descriptions found in MSDS sheets. Typically, MSDS sheets were maintained only while the

substance was in use at our facilities. MSDS sheets were constantly updated and older MSDS sheets were discarded as we received updates. We were only required to maintain MSDS sheets for in-stock products. If a product was discontinued, PPC Corp. maintained the MSDS sheet for one year after it had been discontinued.

b) Provide a copy of all documents referring to or related to the composition of such raw material and waste/by-product including, but not limited to, chemical analyses performed on such raw materials and wastes/by-products; and

See response to Questions 1(b) and 5(a). It has been between 25 – 32 years since 1980 – 1988 and we no longer have any records of the chemical composition of any products from 1980-1988.

c) Identify how each waste/by-product was disposed of between 1980 and 1988.

See response to Question 3 and 4.

6. Identify all chemicals/constituents that would have been present in drums present at any time between 1980-1988 at the facilities identified in response to Question #1(a).

See response to Question 5(a). Mineral and synthetic hydrocarbon oils and any additives that would have been included in the oils by the refinery. It has been between 25 – 32 years since 1980 – 1988 and we no longer have any records of the chemical composition of any products from 1980-1988.

In addition, the truck garage would have had a drum of motor oil (15W40) and a drum of automatic transmission fluid (Dextron ATF) during that time.

7. Identify, and provide a copy of, all contracts and agreements between you and Metro Container Corporation or any related entity under which drums were sent from your facilities to the Metro Container Site (your answer need not identify documents evidencing individual shipments of drums to the Site).

It has been between 25 – 32 years since 1980 – 1988 and we no longer have any records of any contracts or agreements with Metro Container.

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8. Identify the procedures used to determine which drums present at any time at your facilities would be sent to the Metro Container Site.

See General Response.

9. Identify the chemicals/constituents contained in the drums you sent to the Metro Container Site.

See General Response.

10. If you assert in response to Question #9 that some or all of the drums sent to the Metro Container Site were empty, identify the chemicals/constituents that would have been in the drums before they were emptied.

See General Response.

11. Provide the name, title, address, and telephone number of the person answering these questions on your behalf: For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers.

Steve Carten
Facilities Manager
P.O. Box 2621
Harrisburg, PA 17105
717-939-0466
(Questions: 1, 5, 11, 12, 13)

Michael DeStefano
Chief Financial Officer
P.O. Box 2621
Harrisburg, PA 17105
717-939-0466
(Questions: 1, 12)

Raymond B. Harris, III
Technical Service Engineer
305 Micro Drive
Jonestown, PA 17038
717-579-6071

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(Questions: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13)

Jay Stohler
Mechanic
P.O. Box 2621
Harrisburg, PA 17105
717-939-0466
(Question: 6)

This letter was compiled by counsel to PPC Corp. on the basis of factual information provided by the above-identified individuals.

12. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

a) Your document retention policy;

See General Response. Two schedules that represent our records retention schedule are attached.

b) A description of how the records were/are destroyed (burned, archived, trashed, etc.);

See General Response.

c) The approximate date of destruction;

See General Response.

d) A description of information that would have been contained in the documents; and,

See General Response.

e) The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

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Steve Carten produced these documents. With respect to retention and destruction of documents, see General Response.

13. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information that you provide in a response to this request should include the party's name, address, type of business, and the reasons why you believe that the party may have contributed to the contamination at the Site or may have information regarding the Site.

C. R. Sadler Trucking Company, Marysville, Pennsylvania, was the trucking company that hauled the box trailer trucks full of drums to Metro from PPC Corp. Our understanding is that all C.R. Sadler would do was to haul the trailers. To our knowledge they had no other involvement other than to act as the carrier. We do not have current contact information for C.R. Sadler.

Concluding statement

We have made our best efforts to provide you with truthful, complete and adequate responses, given the time frame involved and the lack of documentation or employees who were with the company at the relevant time. We are continuing to search for documents and reserve the right to supplement or amend these responses at any time.

Given the time frame, paucity of documents, and remote possibility that there may be people who believe they have differing recollections, if EPA becomes aware of any information relative to PPC Corp.'s alleged involvement at the Metro Site, which suggests something different than what we have stated in this letter, please bring that to my attention immediately so that we may have the opportunity to review and respond to that information, clarify our response, or provide additional information. Should you have any questions, please feel free to contact me.

Very truly yours,
PPC Corp.:



By: Robert G. Bost
Vice President

Enclosures (Records Retention Schedules)

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BUSINESS RECORDS RETENTION SCHEDULE

The following is a list of suggested retention periods for your business documents.
Please consult your attorney and accountant for further assistance.

	Retention Period		Retention Period
Accident Reports & Claims Settled	7 yrs	Minute Books of Directors & Stockholders, including By-laws	Perm.
Accounts Payable Ledgers	7 yrs	Notes Receivable Ledgers	7 yrs
Accounts Receivable Ledgers	7 yrs	Option Records (expired)	7 yrs
Audit Reports of Accountants	Perm.	Payroll records & Summaries	7 yrs
Bank Reconciliations	1 yr	Petty Cash Vouchers	3 yrs
Capital Stock & Bond Records	Perm.	Physical Inventory Tags	3 yrs
Cash Books	Perm.	Plant Cost Ledgers	7 yrs
Charts of Accounts	Perm.	Property Appraisals	Perm.
Check (cancelled, routine)	7 yrs	Property Records	Perm.
Check (cancelled, Important)	Perm.	Purchase Orders	1 yr
Contracts & Leases (expired)	7 yrs	Purchase Orders (Purchasing Dept. Copy)	7 yrs
Contracts & Leases (in effect)	Perm.	Receiving Sheets	1 yr
Correspondence (general)	3 yrs	Requisitions	1 yr
Correspondence (legal matters)	Perm.	Sales Records	7 yrs
Deeds, Mortgages, Bills of Sale	Perm.	Savings Bond Records	3 yrs
Depreciation Schedules	Perm.	Scrap & Salvage Records	7 yrs
Duplicate Deposit Slips	1 yr	Stenographer's Notebooks	1 yr
Employee Personnel Records (terminated)	3 yrs	Stock & Bond Certificates (cancelled)	7 yrs
Employment Applications	3 yrs	Stockroom Withdrawal Forms	1 yr
Expenses Analyses and Distribution Schedules	7 yrs	Subsidiary Ledgers	7 yrs
Financial Statements	Perm.	Tax Returns & Worksheets	Perm.
General & Private Ledgers	Perm.	Time Books	7 yrs
Insurance Policies (expired)	3 yrs	Trademark Registrations	Perm.
Insurance Records, Claims, Policies	Perm.	Voucher Register & Schedules	7 yrs
Internal Audit Reports	3 yrs	Voucher for Payments to Vendors & Employees	7 yrs
Inventories	7 yrs		
Invoices to Customers	7 yrs		
Invoices to Vendors	7 yrs		

ENVIRONMENTAL RECORD RETENTION REQUIREMENTS

FEDERAL REQUIREMENTS

EPA PROGRAM	RECORD	CITATION 40 CFR	TITLE OF RULE	RECORD RETENTION PERIOD	COMMENTS
CAA	Measurements, Performance, Tests	60.7 (f)	Notification and Recordkeeping	2 years	For NSPS, includes CEMS
CAA	Monitoring Data, Calibration Checks	61.14 (f)	Monitoring Requirements	2 years	For NESHAPS
CAA	Emission Test Results	61.33 (e)	Stack Sampling	2 years	For NESHAPS
CAA	Title V Operating Permit Records	70.6 (a)(3)(ii)(A)(6)	Permit Content	5 years	Data, support documents, applications, etc.
SPCC	SPCC Plans & Inspection Records	112.7 (e) (3)	Guidelines for Preparing & Implementing SPCC Plan	3 years	Keep up-to-date
NPDES	Permit Application Records	122.21 (p)	Application for a Permit - (p) Recordkeeping	3 years	5 years for permits & applications
NPDES	Permit Monitoring Records	122.41 (i) (2)	Conditions Applicable Permits (i) Monitoring Records	3 years	Monitor / maintain / chart / report
RCRA	Hazardous Waste Manifests	262.40 (a)	Recordkeeping	3 years	Keep LDRs with manifests
RCRA	Biennial Reports	262.40 (b)	Recordkeeping	3 years	Some states require annual reports
RCRA	Exception Reports	262.40 (b)	Recordkeeping	3 years	Exception reports to be filed within 45 days
RCRA	Test Results, Waste Analysis	262.40 (c)	Recordkeeping	3 years	Keep up-to-date
RCRA	Inspection Log or Summary	265.15 (b)	General Inspection Records	3 years	Keep up-to-date
RCRA	Training Records	265.16 (e)	Personnel Training	Closure	3 years for former employees
RCRA	Contingency Plan	262.40 (d)	Contents of Contingency Plan	While generating	Keep up-to-date
RCRA	Closure Plan / Amendment / Records	265.112	Closure Plan; Amendment of Plan	~ Closure	TSDF only
RCRA	Closure Plan / Amendment / Records	265.118	Post - Closure Plan; Amendment of Plan	~ Closure +	TSDF only
RCRA	Closure Cost Estimates	265.142 (d)	Cost Estimate for Closure	~ Closure	TSDF only
RCRA	Post-Closure Cost Estimates	265.142 (d)	Cost Estimate for Post - Closure Care	~ Closure +	TSDF only
RCRA	LDR Waste Analysis / Document	266.7(a)(7)	Waste Analysis & Recordkeeping	5 years	Keep up-to-date
UST	Corrosion Inspection Records	260.31 (d) (1)	Operation & Maintenance of Corrosion Protection	3 tests	Tests every 3 years
UST	UST Repair Records	260.33 (f)	Repairs Allowed	UST Life +	Keep up-to-date
UST	Inspection / Repairs / Investigation	260.34 (b)	Reporting and recordkeeping - (b) Recordkeeping	UST Life +	260.20/260.31/260.33/260.45/260.74
UST	Release Detection Records	260.45 (a)(b)(c)	Release Detection Recordkeeping	5 1/5 years	Claims / Tests / Repairs
UST	Closure Records	260.74	Closure Records	Closure + 3	Comply with 260.34 & 260.72
UST	Financial Responsibility	260.11	Recordkeeping	UST Life +	Keep until released under 260.11/260.3
EPCRA	Tier II Reports & Documentation	370.25 (d)	Inventory Reporting	Not Specified	Records must be available for inspection
EPCRA	Form R Reports & Documentation	372.10 (a)	Recordkeeping	3 years	Keep back-up calculations
PCBS	Annual Document Logs	761.180 (a)	Records and Monitoring - (a) In Service/Disposal	3 years after PCBs gone	~ 45 kgs (100 lbs) PCBs / 50 PCB capacitors
PCBS	PCB Manifests	761.209 (a)	Retention of Manifests Records - (a) Generator	3 years	PCB manifests ~ same as RCRA manifests

SELECTED WISCONSIN REQUIREMENTS

CAA	Measurements, Performance, Tests	439.04 (2)	Recordkeeping	5 years	
CAA	Monitoring Data, Calibration Checks	439.04 (2)	Recordkeeping	5 years	
CAA	Emission Test Results	439.04 (2)	Recordkeeping	5 years	
CAA	Annual Reports and Backup Data	438.03 (4)	Required records	5 years	Data, support documents, etc.
RCRA	Hazardous Waste Manifests	615.06 (7)	Manifest System	3 years	Keep LDRs with manifests
RCRA	Annual Reports and Backup Data	615.11 (1) (c)	Reporting	3 years	Annual reports required in Wisconsin
RCRA	Exception Reports	615.11 (2) (e)	Reporting	3 years	Exception reports to be filed within 45 days
RCRA	Test Results, Waste Analysis	615.05 (5)	Hazardous Waste Determination	3 years	Keep up-to-date
RCRA	Inspection Log or Summary	615.05 (4)	General Requirements	3 years	Keep up-to-date
RCRA	Training Records	630.16 (5)	Personnel Training	Closure	3 years for former employees
CWA	Stormwater Records	215.29 (7)	Compliance and Reporting Requirements	5 years	

Revised 07/02/01 - Meyerden Environmental, Inc. - This list should not be assumed to be complete or accurate